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Attorneys for Plaintiff Mind Medicine (MindMed), Inc.

UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF NEVADA

MIND MEDICINE (MINDMED) INC., a
 British Columbia Corporation,

Plaintiff,

v.

SCOTT FREEMAN, an individual and FCM
 MM HOLDINGS, LLC a Wyoming Limited
 Liability Company,

Defendants.

Case No. 2:23-cv-01354

**STIPULATION TO EXTEND BRIEFING
 SCHEDULE ON DEFENDANT SCOTT
 FREEMAN’S RULE 12(b)(6) MOTION TO
 DISMISS [ECF NO. 67], MOTION TO
 CONSOLIDATE CASES UNDER FRCP
 42(a) AND LR 42-1(b) [ECF NO. 68], AND
 ANTI-SLAPP SPECIAL MOTION TO
 DISMISS [ECF NO. 75]**

(First Request)

1 Plaintiff Mind Medicine (MindMed) Inc. (“MindMed”) and Defendant Scott Freeman, by
2 and through their respective counsel of record, stipulate and agree as follows:

3 1. On October 20, 2023, Scott Freeman filed his sealed Rule 12(b)(6) Motion to
4 Dismiss (ECF No. 67).

5 2. On October 20, 2023, Scott Freeman filed his sealed Motion to Consolidate Cases
6 Under FRCP 42(a) And LR 42-1(b) (ECF No. 68).

7 3. On October 31, 2023, Scott Freeman filed his Anti-SLAPP Special Motion to
8 Dismiss (ECF No. 75).

9 4. The parties have conferred and stipulate to the following briefing schedule for all
10 three motions (ECF Nos. 67, 68, and 75):

11 a. MindMed’s opposition briefs shall be filed on or before December 5, 2023;

12 b. Dr. Freeman’s reply briefs shall be filed on or before January 10, 2024.

13 5. The parties respectfully submit that this briefing schedule is warranted in order to
14 give counsel sufficient time to fully brief the numerous complex issues raised by Dr. Freeman. For
15 example, Dr. Freeman’s Motion to Consolidate (ECF No. 68) is eighteen pages in length and
16 makes extensive references to a lawsuit pending before Judge Boulware, *Freeman v. Hurst*, Case
17 No. 2:22-cv-01433-RFB-VCM. The Rule 12(b)(6) Motion to Dismiss (ECF No. 67) is twenty-four
18 pages in length and raises numerous issues that must be addressed by both sides. And, the Anti-
19 SLAPP Special Motion to Dismiss (ECF No. 75) is forty-five pages and contains four separate
20 appendices with sixty exhibits (ECF Nos. 76-79). The briefing schedule proposed by the parties
21 will allow both sides sufficient time to fully and professionally brief the issues raised by Dr.
22 Freeman without interfering with the upcoming holidays.

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6. This is the first request for an extension of time of the briefing schedule with respect to ECF Nos. 67, 68, and 75. This stipulation is made in good faith for the reasons outlined above and not for the purpose of delay.

DATED this 3rd day of November, 2023.

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DATED this 3rd day of November, 2023.

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ORDER

IT IS SO ORDERED:


UNITED STATES MAGISTRATE JUDGE

DATED: November 3, 2023